

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JANE DOE

Plaintiff,

v.

ENI TRADING & SHIPPING, INC.

Defendant.

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CIVIL ACTION NO. 4:16-CV-1012

JURY TRIAL DEMANED

PLAINTIFF'S EXPERT WITNESS DESIGNATION

Plaintiff files her Designation of Expert Witnesses as follows:

1. Nitin Sud
Sud Law P.C.
6750 West Loop South
Suite 920
Bellaire, TX 77401
Phone: 832-623-6420

Mr. Sud may offer expert opinion testimony regarding the reasonableness, necessity, and amount of attorneys' fees incurred by Plaintiff and Plaintiff's entitlement to these fees under the law. Mr. Sud may also offer rebuttal testimony to any experts designated by Defendant concerning attorneys' fees. Generally, Mr. Sud will testify that because of Defendant's actions, Plaintiff was required to retain legal counsel, incurred fees and costs, and is entitled to the recovery of reasonable and necessary expenses and fees for the legal services.

Mr. Sud's findings, conclusions, opinions, and testimony will be based upon his background, knowledge, experience, and the time expended on the case, the novelty and difficulty of the questions involved in the case, and any other relevant factors as defined by law. Mr. Sud

may also base his opinion on all available billing information, as well as the pleadings, discovery, and other documents on file or produced in the case.

Mr. Sud obtained his undergraduate degree from Duke University and his law degree from the University of Houston Law Center. He is certified by the Texas Board of Legal Specialization in labor and employment law. He has practiced almost exclusively in labor and employment law for nearly twelve years, primarily in Houston, TX. He is a member of the National Employment Lawyers Association (NELA) and serves as a Council member of the Labor and Employment Section of the Houston Bar Association. Additional information can be located at www.sudemploymentlaw.com, including his prior work history.

Plaintiff may also elicit expert testimony from any and all experts or representatives who have been, or may be, designated by or called by Defendant and who the Court allows to testify. Plaintiff reserves all additional rights he may have with regard to experts under the Federal Rules of Civil Procedure, the Rules of Evidence, the Local Rules, and the Court's procedures or rulings.

Respectfully submitted,

SUD LAW P.C.

/s/ Nitin Sud

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Attorneys for Plaintiff,
Jane Doe

CERTIFICATE OF SERVICE

I certify that Plaintiff's Expert Witness Designation was served on the following attorney via the court's electronic filing system on May 8, 2017:

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/s/ Nitin Sud
Nitin Sud